

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
Executive Director

Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

June 17, 2021

By ECF

The Honorable John G. Koeltl  
United States District Judge  
500 Pearl Street  
New York, New York 10007

APPLICATION GRANTED  
SO ORDERED

Re: *United States v. Jeremiah Gilliam, 21 Cr. 18 (JGK)*

6/17/21   
John G. Koeltl, U.S.D.J.

Dear Judge Koeltl:

I write to respectfully request a modification of Jeremiah Gilliam's bail conditions to remove the condition of home detention and replace it with a curfew enforced by location monitoring as directed by pretrial services. Mr. Gilliam has been on home detention for six months and, given that he has maintained excellent compliance with his release conditions, his Pretrial Services Officer, Bernisa Mejia, has no objection to this modification. Additionally, Mr. Gilliam's fiancé is scheduled to undergo a medical procedure in the near future and the recovery therefrom will limit her ability for several weeks to run the family errands and take the children to and from school. This modification will allow Mr. Gilliam take over those responsibilities. Finally, as a self-employed mechanic who repairs small engines and customizes motorbikes, the requirements of home detention have prevented Mr. Gilliam from undertaking individual jobs and a curfew will allow him greater flexibility to seek and maintain employment. The Government defers to the position of Pretrial Services.

On December 16, 2020, Magistrate Judge Robert W. Lehrburger set conditions of release including the following: a \$75,000 personal recognizance bond to be signed by two financially responsible persons, travel limited to SDNY/EDNY, pretrial supervision as directed by Pretrial Services, drug testing and treatment, home detention with electronic monitoring and for Mr. Gilliam to continue or seek employment.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Amy Gallicchio  
Amy Gallicchio  
Assistant Federal Defender  
(212) 417-8728/ (917) 612-3274

cc: AUSA Matthew Shahabian, USPTSO Bernisa Mejia